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-and-

Robert J. Feinstein, Esq.
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Counsel to the Circuit City Stores, Inc. Liquidating Trust

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
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*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
	:	Jointly Administered

**MOTION FOR ADMISSION
PRO HAC VICE OF BETH E. LEVINE**

Lynn L. Tavenner and Paula S. Beran (“Movants”) hereby move the Court, pursuant to Local Bankruptcy Rule 2009-1(E), to enter an order authorizing Beth E. Levine (“Ms. Levine”), an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP, to appear pro hac vice in

the referenced proceeding before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”) to represent the Circuit City Stores, Inc. Liquidating Trust, and in support of this Motion, the Movants state as follows:

1. Movants are members in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.
2. Ms. Levine is a member of good standing of the State Bar of New York and is an attorney admitted to practice before the United States District Court for the Northern, Southern, Eastern and Western Districts of New York, and the United States Ninth Circuit Court of Appeals. There are no disciplinary proceedings pending against Ms. Levine in any jurisdiction in which she is admitted to practice.
3. Movant requests that this Court authorize Ms. Levine to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related adversary proceedings) on behalf of the Circuit City Stores, Inc. Liquidating Trust.
4. Movant and her law firm shall serve as co-counsel with Ms. Levine in the Bankruptcy Case (and related adversary proceedings).
5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtor, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

6. The Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rules 2090-1(E) is attached hereto as Exhibit A.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Beth E. Levine to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit B attached hereto and grant such other and further relief as just.

Dated: September 8, 2014

Respectfully submitted,

/s/ Paula S. Beran

Movant

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
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Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust

CERTIFICATION OF SERVICE

I hereby certify that on the 8th day of September, 2014, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Beth E. Levine was served on all persons receiving electronic notice in these cases, including:

Assistant United States Trustee
Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad Street, Suite 4303
Richmond, VA 23219

/s/ Paula S. Beran
Movant

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35655 (KRH), * Case Name CIRCUIT CITY STORES, INC., et al.

PERSONAL STATEMENT

FULL NAME (no initials, please) BETH E. LEVINE
Bar Identification Number 2572246 State NY
Firm Name PACHULSKI STANG ZIEHL & JONES LLP
Firm Phone # (212) 561-7700 Direct Dial # (212)561-7720 FAX # (212) 561-7777
E-Mail Address blevine@pszjlaw.com
Office **Mailing** Address 780 Third Avenue, 34th Floor, New York, NY 10017
Name(s) of federal court(s) in which I have been admitted NY Northern, Southern, Eastern & Western District Courts

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Paula S. Beran

August 14, 2014

(Signature)

(Date)

Paula S. Beran

(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

EXHIBIT B

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
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CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
	:	Jointly Administered

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF BETH E. LEVINE**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of
Beth E. Levine (the “Motion”) filed by Lynn L. Tavenner and Paula S. Beran, seeking
admission pro hac vice for Beth E. Levine, of the law firm of Pachulski Stang Ziehl &

Jones LLP, in the above-referenced bankruptcy case (the “Bankruptcy Case”) pursuant to Local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Beth E. Levine be authorized to practice pro hac vice before the Court in this Bankruptcy Case and any related adversary proceedings, it is hereby

ORDERED as follows:

1. The Motion is hereby Granted.
2. Beth E. Levine, of the law firm of Pachulski Stang Ziehl & Jones LLP is hereby admitted to appear in this Bankruptcy Case and any related adversary proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of the Circuit City Stores, Inc. Liquidating Trust.

Dated:

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

/s/ Paula S. Beran

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN PLC
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Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust

RULE 9022-1 CERTIFICATION

I HEREBY CERTIFY that the foregoing proposed order has been endorsed by all
necessary parties.

/s/ Paula S. Beran

*Co-Counsel for the Circuit City Stores, Inc.
Liquidating Trust*